

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

In Re:	:	
	:	
EARLE D. MUNNS	:	
	:	
Debtor	:	Case No. 11-10912-RGM
	:	(Chapter 7)
.....	:	
	:	
BANK OF AMERICA N.A.	:	
	:	
Plaintiff	:	
	:	Adv. No. 11-01255-RGM
	:	
v.	:	
	:	
EARLE D. MUNNS	:	
	:	
	:	
Defendant	:	

ANSWER

COME NOW the defendant, EARLE D. MUNNS, and answers the complaint filed herein as follows:

1. The allegations in paragraphs 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 21, 22, 27, 33, 36, 42, 53, 54, 55, 57, 61, 62, 63, 64, 65, 66, 68, 69, 84, 85, and 97 are admitted.

2. The allegations in paragraphs 14, 16, 18, 19, 25, 26, 29, 31, 35, 41, 45, 46, 47, 52, 58, 60, 67, 71, 72, 73, 74, 77, 78, 79, 81, 82, 83, 88, 89, 92, 93, 96, 98, and 99 are denied.

3. The defendant either lacks sufficient information to admit or deny the allegations in the following paragraphs or they contain legal conclusion to which no response is required, but to

the extent any further response is required the allegations are denied: 13, 15, 17, 20, 23, 24, 28, 30, 32, 34, 37, 38, 39, 40, 48, 49, 50, 51, 56, 59, 70, 75, 76, 80, 86, 87, 90, 91, 94, and 95.

4. Paragraphs 43 and 44 contain allegations regarding the debtor's intent and the participation of the debtor in the activity described, in each case the defendant denies the allegations regarding his actions and intent, but admits the remaining allegations contained therein.

WHEREFORE the defendant prays that this court dismiss the Complaint and deny all relief requested thereunder, and award him his attorney's fees and costs, and for such other relief as may be needed.

EARLE D. MUNNS

By counsel

/s/ Richard G. Hall
RICHARD G. HALL, Esquire
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CERTIFICATE OF SERVICE

I hereby certify that on June 13, 2011 a copy of this Answer was served on the plaintiff, c/o Michael A. Hass, at Ober, Kaler, Grimes & Shriver, 1401 H Street, N.W., Fifth Floor, Washington, D.C. 20005.

/s/ Richard G. Hall